



# **Introduction to Modules**

**RCRAInfo National Implementer Training**

**July - August, 2000**

# **Handler Module**

## **Brief History**

The basic information in Handler,(Facility name address and activity information), has not changed.

How EPA ID number are issued and how universes have been calculated has changed over time in RCRIS.

EPA ID's were issued by Regions using the Finds System until early 1995 when RCRIS created EPA ID #s. In RCRIS, the third character of the EPA ID is R, before this in finds the third character of the ID could have been any character. With ID's being generated from RCRIS the States could take over the entire function of issuing EPA IDs.

Before the Permit Module Redesign the TSD, Generator, and Transporter universe was calculated based on a hierarchy of Source Types, with Part A Process Code Information referenced for TSD's. Process code information was striped out of handler as a result of the Permit Redesign and permit unit detail data became the primary source for calculating TSD universes.

The Generator and Transport Universe calculation was changed to latest source record.

## **Structural Difference between RCRIS and RCRAInfo**

The structure for handler was discussed at length and changed at almost every design team meeting. To position the module for the WIN/Informed initiatives the structure was enhanced to take advantage of the flexible architecture of a relational database. The team deferred several issues until implementation of the results of the WAM/UID PAA, but the team is happy to inform you that the structure in Handler was changed to add Handler Name and Activity history. Handler was the only module that contained no historical information other than owner/operator. The source sequence number is now part of the key instead of the received date.

## **Handler Module (cont.)**

### **RCRAInfo Functionality**

#### **National Data Views -**

All data is seen by all authorized State and EPA users (read access only).

Any Region or State can link their CME Data, or Permitting Events, to any Handler in Hbasic.

(An implementor can link an evaluation of an out-of-state transporter without creating a handler record.)

An IOR of Handler can create an Out-of-State Handler Record and Handler Source Record.

A RCRA ID in Handler cannot be deleted by the In-State IOR until all linked records not owned by the IOR are deleted first.

Two different ways to enter data.

The Notification and Part A Form View and

an All data view which you can Add/Update/Delete a specific section of handler data.

Dummy handler record does not need to be created in the Handler Module.

#### **Search Screen**

Search on any one of the criteria shown

“Contains” search done with % character

%MAIN% will pull anything that contains the characters MAIN in that column.

MAIN% will pull anything that starts with the character MAIN in that column.

Location and Address Street Number can be parsed out as an option in converting

#### **Search Results**

Search results shows the calculated universe(s), activity location, and location address.

Click on Handler in the results table to add, update or delete a **source record**.

If your facility is not in the results table you can Assign a RCRA ID as a part of

Create Handler Record

#### **Assign a RCRA ID**

Select Source Record to Add (Notification, State, or EPA)

Next screen will be like a blank Notification Form

Have RCRAInfo assigned a RCRA ID # or enter a Secondary ID.

RCRA ID Number is not saved until the Notification Form is saved.

Notification History can be kept!!

#### **Add, Update, or Delete a Handler Source Record**

Select Add for a new/additional Source Record

To update or delete, click on source record.

N, E, or S records take you to Notification Screens

Part A source records go to Part A screens

Click on ALL Data for all Handler data which includes data not found on the

Notification or Part A Form.

The non-source data will be shown with all source records. Depending on IOR privilege and user rights and if the selected source data exists, the user can create a new source record or add to, update, or delete an existing source record.

#### **Part A Add Screens**

Format is similar to EPA 8700-23 Form.

Same features as the Notification Form

SIC code format same as RCRIS

Section XII and XIII of the Part A (Process Code Information) is only entered in the Permitting Module.

Select Hazardous Waste Stream Information to get to the Descriptions of Hazardous Waste and Waste Code Screens.

## **Handler Module (cont.)**

### **Conversion Issues**

Source of Handler Data is the database of the implementor that is IOR,  
with an option to convert data where merge send flag is set to no.  
Must have a valid state postal code in the first two characters of the ID (e.g.Canada IDs)  
Non-Standard Implementer IDs with valid state postal code is OK.  
Parsing out street number for location and for mailing addresses

### **Heads up / Highlight issues Users should be aware of**

RCRAInfo matches the current Notification Form.  
(Universal Waste, HW Fuel and Used Oil).  
Requirements from the Universe Identification / Waste Activity Monitoring PAAs of the  
WIN/Informed initiative will be implemented in the coming year:  
Latitude/Longitude for all sites  
SIC/NAICS (North American Industrial Classification System)  
RCRIS/BRS site history

# **Compliance Monitoring and Enforcement Module (CM&E)**

## **Brief History**

CM&E is comprised of evaluations (also called inspections), violations and enforcement actions.

During the conversion from HWDMS to RCRIS the CM&E module underwent substantial changes. Once in RCRIS additional changes were made such as no longer requiring coverage area, class or priority.

The CM&E was basically converted as is into RCRAInfo.

## **Structure Changes**

There was only one structure change made in the Compliance Monitoring and Enforcement section of RCRAInfo. A table (CLN\_COMPLIANCE\_SCHEDULE) was added between the violation and enforcement tables. By adding this linking table we obtain the ability to know exactly which enforcement action scheduled the compliance for the violation and we maintain history of compliance schedules. As you remember in RCRIS the compliance schedule date was written over with the scheduled date of the latest enforcement action which addressed the violation. Previous scheduled compliance date , were lost.

Two new fields were also added to RCRAInfo:

Responsible\_Agency

used to indicate which agency the violation has been referred to.

Qualifier

used to return violations to full physical compliance.

## **Functionality Changes**

- 1) When adding a new evaluation you will be asked “Did this evaluation find any violations?” This is a required field and there is an edit check that will prevent you from continuing without entering a response. If ‘Y’ is entered you can not “Save” without entering or linking to a violation. If ‘N’ or ‘U’, for undetermined is entered you can only “Save”. You will not be able to continue to the next page (Select Violations) or to the Coverage Area page.

## **CM&E Module (cont.)**

### **Functionality Changes** (cont.)

- 2) As you have seen during user testing and will see again today during the walk through, the screens will guide you along in processing evaluations, violations and enforcement actions. You will not have to remember codes, since there are drop-down boxes for everything. You will no longer have to remember to go to the linking screens, since this is part of the process of entering an evaluation or enforcement action and not a separate process. Finally, you will no longer have to “hit” the F1 key to see a list of what has already been entered.
- 3) CM&E data performed in one State can now be linked to out-of-state facilities without the need to enter an in-state ID.
- 4) One additional point I want to emphasize is that the screens were designed to provide more useful information in an easy to use format for program staff, program managers and the occasional user - -- NOT just for the data entry staff.

### **Conversion Issues**

#### **Evaluations:**

- 1) EVALUATION\_SEQ comes from positions 9-11 of RCRIS CE\_NUM. If positions 9-11 of CE\_NUM are blank “000” is inserted in RCRAInfo, since in RCRAInfo no part of the primary key can be blank.
- 2) The field Found\_Violation will be derived as follows:
  - a) If this evaluation is linked to at least one non-Pending violation (CEV\_CLAS NOT = ‘P’), Found\_Violation is set to ‘Y’.
  - b) else if any coverage areas say undetermined, Found\_Violation is set to ‘U’,
  - c) else if this evaluation is linked to a pending violation (CEV\_CLAS = ‘P’), Found\_Violation is set to ‘U’
  - d) else if all evaluated coverage areas say ‘no viols found’, Found\_Violation is set to ‘N’
  - e) else offer conversion switch to allow regional DBA to choose to load remaining Found\_Violation flags as either ‘blank’ or ‘N’. This choice was provided on the Conversion Survey and will apply to the Region and ALL the States in that region.

Valid values for Found\_Violation are:  
‘Y’ = violations found  
‘N’ = no violations found  
‘U’ = undetermined  
blank = used to take care of pre-conversion, but when accessed by RCRAInfo screens, one of the other values (Y, N or U) must be entered.

## **CM&E Module (cont.)**

### **Conversion Issues** (cont.)

#### **Evaluation Areas:**

EVALUATED converts from CE\_STATUS in RCRIS. If CE\_STATUS is blank in RCRIS, we will not convert its Area Evaluated into RCRAInfo.

#### **Evaluation-Violation Links:**

SNY and SNN evaluation types will be converted as they are in RCRIS. If they are linked to a violation in RCRIS they will be linked in RCRAInfo, if they were not linked to a violation in RCRIS then they will not be linked to a violation in RCRAInfo. RCRAInfo screens will allow you to either link SNY/SNNs to violations or not just as RCRIS currently does.

Note: This is a change from the dropping and preventing of links which was originally proposed in the Conversion Issue paper dated April 6, 2000.

#### **Violations:**

- 1) In the table CVIOLATION the fields DETERMINED\_BY\_AGENCY and RESPONSIBLE\_AGENCY are loaded using the following rules:
  - a) Populate DETERMINED\_BY\_AGENCY from position 13 of CEV\_VIOL\_KEY.
  - b) Find the latest agency referral enforcement action (CEE\_ACT\_TYP = 810-829) linked to the violation.
  - c) If the action is type 810-819 (State to EPA) set RESPONSIBLE\_AGENCY to EPA ('E').
  - d) else if the action is type 820-829 (EPA to State) set RESPONSIBLE\_AGENCY to State ('S').
  - e) else set RESPONSIBLE\_AGENCY the same as DETERMINED\_BY\_AGENCY.
- 2) Conversion sets RTC\_QUALIFIER to 'O' (which decodes to 'OBSERVED') meaning full physical compliance.
- 3) Area of Violation (CEV\_AREA) will be converted as is with no compression. Therefore, implementer defined codes beginning with 'D', 'G' and 'T' will not compress down into 'DOT', 'GER' or 'TRR' but will remain as defined by the implementer.

#### **Compliance Schedule:**

The RCRIS scheduled compliance date (CEV\_SCH\_DTE) will be loaded into the CLN\_COMPLIANCE\_SCHEDULE link (COMPLIANCE\_SCHED\_DATE). This will be done by putting each violation's scheduled compliance date into the last linked enforcement action who's date is before the scheduled compliance date and who's enforcement type and agency could schedule compliance by the following:

- a) Get enforcement action types 100-399, 500-799, with the same agency as RESPONSIBLE\_AGENCY and the enforcement date (CEE\_ACT\_DTE) on or before the violation's scheduled compliance date (CEV\_SCH\_DTE).
- b) Put the violation's scheduled compliance date (CEV\_SCH\_DTE) into the link between the violation and the latest enforcement found in (a).

## **CM&E Module (cont.)**

### **Conversion Issues** (cont.)

#### **Enforcement Actions:**

- 2) ENFORCEMENT\_SEQ comes from positions 9-11 of RCRIS CEE\_ENF\_NUM. If positions 9-11 of CEE\_ENF\_NUM are blank a "000" are inverted in RCRAInfo, since in RCRAInfo no part of the primary key can be blank.
- 3) All enforcement actions will be converted as is, there will be no compression of the third digit to '0'. Therefore a 222 will remain a 222, as entered by the implementer and will not become a 220.

### **Heads up/Highlight**

- 1) One last reminder, violations in RCRIS which were not linked to any evaluation were not converted to RCRAInfo. If you want to check to see if you will be losing any violations you can run the CM&E Data Assessment Report of Violations With No Associated Evaluations which can be found in RCRIS under the Data Assessment section, CM&E Orphan Reports option # C.
- 2) In this release of RCRAInfo there are only 3 CM&E reports available: the Violation Report, the FOIA Report and the CM&E Comprehensive Report. Additional reports will be included in the next update to RCRAInfo after the training sessions.



# **Permitting Module**

## **Brief History**

*HWDMS* started in approx. 1980. One central database. No IOR. Nightly batch load.  
Many event codes that we still use originated in HWDMS.  
Events group in “headers” Identified by 3 Characters such as P01, C01, etc.  
Linking to process codes allowed for only a few key events, such as Part B submittal.

*RCRIS* started in 1991. IOR, 2 domain, core/non-core.  
Continued event codes from HWDMS.  
Defined events as Code or Non-core  
IOR controlled by agency for events  
Simple process codes replaced by unit group concept: 10 character names, numbers of  
Units in group.  
Linking to unit groups possible from any event  
Headers replaced by Series, identified by seq. Number and 12 char. name  
Unit groups restrained within series

### ***RCRIS Permit Redesign***

Put unit groups at ID level, so events in any series could be linked to a UG.  
Allowed unit group history by adding a child segment to unit group file  
Added legal/operating status codes for every UG record. Used in determining  
TSD universes. This has shifted emphasis from event data to unit data.

## **RCRAInfo Structure**

Essentially unchanged.  
No significant structure changes.  
Event seq now 3 rather than 2 digits.  
Unit capacity type is new (optional) field.

## **Functional changes**

Event-unit links now required when adding or updating any event.

## **Conversion notes**

Capacity type conversion allowed options: “Cobb logic”, all one type or blank  
Staff initials converted from data (as in other modules; will need cleanup)

## **Corrective Action Module**

### **Brief History**

HWDMS introduced some CA events that are still in the RCRIS DED and some exist in the EVENT file in RCRIS. Example: OP454 RCRA Facility Assessment.

CARS (Corrective Action Reporting System) came along in approx. 1987. This was a PC FOCUS system distributed to the Regions. CARS introduced a new set of event codes, including some that replaced (theoretically) HWDMS CA codes. Example: CA050 replaced OP454. But - did everyone stop using the HWDMS codes? CARS introduced much of the current structure, including CA Areas, instruments, etc. However, the HWDMS CA events were not converted to CARS events.

RCRIS carried forward the structure introduced by CARS. Conversion was direct from CARS to the CA module in RCRIS. (The old HWDMS CA codes were still not converted.)

Linking was optional and primarily for user tracking convenience, until -

PARS logic, started in 1997 (?). Because of PSPD's need to know when certain milestone events applied to the entire facility, it was decided that the only way to indicate this was to leave these events unlinked to any area. This was necessary because RCRIS has no positive way of indicating an area is the entire site.

RCRIS linking has been a problem (beside the PARS requirement above) because RCRIS makes you link to both an area and an instrument if you link to either. This is a flaw, because many CA events happen before an instrument is issued (ex.: RFA-CA050); or, the event bears no relationship to any instrument (ex: NCAPS ranking-CA075). RCRIS does not have any "instrument" types to use in these cases.

### **RCRAInfo Structure**

No changes.

Area-Event-Instrument (Authority in RCRAInfo) relationships are same as RCRIS.

## **Corrective Action Module (cont.)**

### **RCRAInfo functional changes**

“Instrument” in RCRIS is “Authority” in RCRAInfo. There is an authority to cover all CA activity. New authorities: X - Agency policy/Procedure; I - Interim Status. All events added or updated must be linked to at least one authority.

**New:** Facility-wide flag. This solves the RCRIS problem of not having a way to identify entire site areas.

Full linking is enforced in RCRAInfo for all events. When a new event is added or an unlinked event converted from RCRIS is updated, it will have to be linked to one or more areas and one or more authorities - and we now have an Authority to support all CA activity.

### **Conversion/Post-conversion Issues**

Facility-wide area flags set in conversion according to conversion choices: 1) based on area name specified by user, 2) all Area #1's, 3) not set (User sets it manually).

Facility-wide flag will be used for End-of-Year PARS, so “cleanup” will be needed to link PARS events to Facility-wide area. PARS events affected: CA725, 750, 075, 210, 999. Other linking can follow later.

A Post-conversion utility will help with these linking issues. Options: link only PARS events, or 2) link all unlinked events to the facility-wide area.

